

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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TED DOUKAS, SYNGEN DATA SERVICES CORPORATION, TED DOUKAS as a shareholder of SYNGEN DATA SERVICES, TED DOUKAS, as a joint venture partner with CLAUDIO BALLARD, TED DOUKAS as an equitable owner of all patents and technology owned by CLAUDIO BALLARD or his purported assignees, TED DOUKAS as an equitable owner of all patents and technology owned by DataTreasury Corp.; TED DOUKAS as owner of certain technology and Assets produced by a joint venture with CLAUDIO BALLARD, TED DOUKAS as a 50% equitable owner of DataTreasury Corp., an assignee of CLAUDIO BALLARD's ownership of certain technology developed by the joint venture and unknown Defendants named John and Jane Does "1" through "750", TED DOUKAS as the constructive and beneficial owner of all settlements and licensing agreements relating to certain technology created by virtue of a joint TED DOUKAS as a joint venture owner of the assets of a joint venture partnership commonly referred to "the *Doukas/Ballard joint venture*",

Plaintiffs,

-against-

CLAUDIO BALLARD, KEITH DELUCIA a/k/a "KEITH WICKEY", a/k/a "KEITH DOYLE", SHEPHARD LANE, UNIDENTIFIED DEFENDANTS JOHN AND JANE DOES "1" THROUGH "750", UNIDENTIFIED CORPORATE ENTITIES "1" THROUGH "75", UNKNOWN LICENSES AND BANKING INSTITUTIONS "1" THROUGH "75", DATATREASURY CORP., KEITH DELUCIA a/k/a "KEITH WICKEY", a/k/a "KEITH DOYLE" as an owner of shares in DataTreasury Corporation, SHEPHARD LANE, as an owner of shares in DataTreasury Corporation, CLAUDIO BALLARD, as an owner of shares in DataTreasury Corporation, SYNGEN CORPORATION, CLAUDIO BALLARD as an owner of shares in SYNGEN CORPORATION, CLAUDIO BALLARD as the fiduciary to TED DOUKAS and SYNGEN DATA SERVICES CORPORATION, CLAUDIO BALLARD as the Constructive trustee of

STIPULATION AND
[PROPOSED] ORDER
EXTENDING TIME TO
ANSWER OR RESPOND TO
COMPLAINT

No. 11-cv-03275

TED DOUKAS' interest in the technology created by a joint venture, PETER LUPOLI, VIRGINIA LUPOLI, CSP HOLDINGS INC., HAROLD NIX (individually), NIX, PATTERSON AND ROACH, LLP, BANK OF AMERICA, WELLS FARGO, CITIBANK, BANK HAPOALIM, BANCORPSOUTH, INC., INTUIT, INC., KEYCORP and KEYBANK NATIONAL ASSOC., JP MORGAN CHASE & CO., INGENICO, JP MORGAN CHASE BANK, M&T BANK CORP., MERRILL LYNCH, UNION BANK OF CALIFORNIA, PNC FINANCIAL SERVICES GROUP, CHARLES SCHWAB & CO., INC. and CHARLES SCHWAB BANK, MERRILL LYNCH, PIERCE, FENNER & SMITH, INC., PNC FINANCIAL SERVICES GROUP, THE ROYAL BANK OF SCOTLAND GROUP, SUNTRUST BANK, INC., WELLS FARGO & COMPANY, BANK OF TOKYO-MITSUBISHI UFJ, LTD., THE BANK OF NEW YORK MELLON CORPORATION, THE BANK OF NEW YORK MELLON, CITIGROUP, INC., CITIBANK, N.A., CITY NATIONAL BANK, COMMUNITY BANKING SYSTEMS, BRANCH BANKING AND TRUST CORPORATION, COMERICA BANK, COMERICA INCORPORATED, COMPASS BANCSHARES, INC., COMPASS BANK, DEUSTSCHE BANK, EDWARD D. JONES & CO., L.P., HSBC NORTH AMERICA HOLDINGS INC., HSBC BANK USA, N.A., FIRST TENNESSEE BANK NATIONAL ASSOCIATION, CULLEN/FROST BANKERS, INC., and THE FROST NATIONAL BANK,

Defendants.

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IT IS HEREBY STIPULATED AND AGREED by and between the undersigned counsel for Plaintiffs Ted Doukas and Syngen Data Services Corporation, et al. and Defendants The Bank of New York Mellon and The Bank of New York Mellon Corporation, that the time for Defendants to answer, move, or otherwise respond to the complaint in the above-captioned action is extended to August 15, 2011.

Dated: New York, New York
July 18, 2011

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SO ORDERED, this _____ day of July, 2011

United States District Court Judge